

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
Negotiated Channel Election)	MB Docket No. 03-15
Arrangement proposed by WKMG-TV,)	FCC File No. BFRECT-20050210ABK
Orlando, Florida (Facility ID No. 71293))	
)	
Second Periodic Review of the)	
Commission's Rules and Policies)	
Affecting the Conversion to Digital)	
Television)	
To: The Secretary		
Attn: Chief, Media Bureau		

REPLY TO COMMENT

On behalf of Post-Newsweek Stations, Orlando, Inc. ("Post-Newsweek" or "WKMG"), licensee of Television Station WKMG-TV and Digital Television Station WKMG-DT, Orlando, Florida, the instant Reply To Comment is filed in response to the unauthorized pleading denominated "Comment" filed by Waterman Broadcasting Corporation of Florida, Inc. ("WBBH"), licensee of WBBH-DT, Fort Myers, Florida, on March 29, 2005, concerning WKMG's digital television channel election. To the extent the Commission's approval is required for this filing, WKMG hereby requests leave to file this Reply.

WKMG submits that WBBH's Comment does not accurately characterize the discussions between representatives of WKMG and representatives of WBBH concerning WKMG's proposed post-transition digital operation on Channel 15. As detailed in the attached declaration from Henry

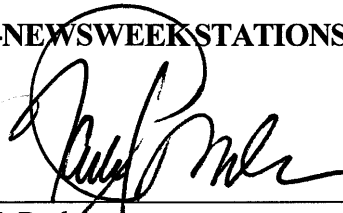
Maldonado, the General Manager of WKMG, Post-Newsweek's proposal to WBBH was not one which required unilateral and complete capitulation by WBBH. Rather, WKMG had recognized that some technical modification to its proposed Channel 15 operation would be necessary and had attempted to discuss with WBBH a solution that would reduce the amount of predicted interference to WBBH, albeit, the resulting *de minimis* interference would still be above the 0.1 percent threshold. Despite WKMG's efforts to discuss a "middle ground," WBBH simply refused to consider any proposals involving interference in excess of 0.1 percent.

For the foregoing reasons and the reasons set forth in its Reply to Objection to Negotiated Channel Election Arrangement, Post-Newsweek respectfully requests that the Commission approve WKMG's election of Channel 15 for its post-transition DTV operation.

Respectfully submitted,

April 12th, 2005

POST-NEWSWEEK STATIONS, ORLANDO, INC.



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DECLARATION OF HENRY MALDONADO

I, Henry Maldonado, hereby declare under the penalty of perjury that the following is true and correct to the best of my personal knowledge, except to the extent the following is based upon information and belief which I believe to be true and correct:

1. I am the General Manager of WKMG-TV and WKMG-DT, Orlando, Florida.
2. I had several conversations with Steven H. Pontius, the General Manager of WBBH-TV, Fort Myers, Florida, concerning WKMG-DT's proposed post-transition digital operation on Channel 15. In those conversations, we discussed the predicted interference to WBBH that might result from WKMG-DT's operation on Channel 15. I told Pontius that WKMG-DT would be willing to consider technical modifications to WKMG-DT's proposed operation that would reduce the predicted interference to WBBH by use of a directional antenna.
3. The engineers of WKMG-DT's and WBBH's respective stations had further discussions about WKMG-DT's operation on Channel 15, which resulted in a technical solution and a determination that a reduction of the predicted interference to a level of 1.0 to 1.5 percent could be accomplished and would be acceptable to WKMG.
4. I spoke with Pontius in attempt to discuss the technical solution and to negotiate WBBH's consent to the technical solution.
5. Pontius indicated that WBBH would not consider any technical solution that would result in predicted interference in excess of 0.1 percent.
6. At all times, WKMG-DT was willing mitigate the proposed interference to WBBH and had offered a technical solution as a reasonable "middle ground." WBBH simply declined to pursue a negotiated resolution of this issue and held firm that it would not accept any interference in excess of 0.1 percent.



Henry Maldonado

Date: April 12th, 2005

CERTIFICATE OF SERVICE

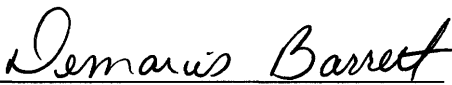
I, Demarvis Barrett, do hereby certify that I have this day caused copies of the foregoing **REPLY TO COMMENT** to be sent via United States Express Mail and e-mail to:

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This, the 12th day of April, 2005.


Demarvis Barrett